

# **Exhibit 10**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

CHILD TRENDS, INCORPORATED et al.,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
EDUCATION et al.,

*Defendants.*

Case No. 8:25-cv-01154-BAH

**DECLARATION OF JOHN DOE**

I, John Doe, declare the following under penalty of perjury:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.
2. I was an employee of the U.S. Department of Education (“ED” or the “Department”) currently on administrative leave. Specifically, I was an employee of the National Center for Education Evaluation and Regional Assistance (“NCEE”), which is one of four centers within the Institute of Education Sciences (“IES”).
3. All staff for the Regional Educational Laboratories (“REL”) program work within NCEE.
4. No REL staff within NCEE had advance notice of or were part of the decision to terminate the REL contracts. Until termination notices for the REL contracts were disseminated on February 13, 2025, REL staff within NCEE were operating with the understanding, based on information from NCEE leadership, that the REL programs would be spared from the imminent contract terminations at the Department.
5. During the time between the REL contract terminations on February 13, 2025 and when I

began on administrative leave on March 21, 2025, I was not aware of any effort to recompete the REL contracts. I was aware of requests to the Office of the Secretary to recompete or renegotiate other contracts or grants at a substantially lower cost, and my understanding is that those requests were all denied.

6. On March 11, 2025, along with all other career staff in NCEE, I received a notice that I would be part of a Reduction in Force (RIF). Every NCEE employee working on the REL program received the same notice. The REL staff were all placed on administrative leave as of March 21, 2025, and later received official RIF notices on April 9, 2025.
7. As a result, every single REL program staff member remaining at the Department is currently on administrative leave and will no longer be an employee of the Department as of June 10, 2025. While on administrative leave, REL staff are not able to access ED systems and cannot work on the REL program. All IES staff who received the notice that they would be part of a RIF were required to turn in all government furnished equipment (GFE) or provide information so that GFE could be mailed to the Department the week of March 24, 2025.
8. As far as I am aware, the Department has not taken any formal steps to recompete the REL contracts. In my opinion, the Department will not restart the REL program on its own volition.
9. One fact that supports my belief the Department does not intend to operate the REL program is that all Contracting Officer Representatives (“COR”s) in NCEE received RIF notices. My understanding is that there are only three CORs remaining elsewhere in IES to handle all COR work for remaining IES contracts, on top of the grants and contracts they were already responsible for overseeing.

10. At the time that the REL contracts were terminated, the contracts were in year four of a five year cycle. The Department had already spent the vast majority of its funds for this cycle on projects that will now never see the light of day. Millions of dollars in taxpayer support projects will be wasted.

Executed on April 15, 2025.

/s/ John Doe  
John Doe